UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In Re: Madeline A. Ceraul,

Debtor(s)

Chapter 13 Bankruptcy Number
16-17821 REF

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Madeline A. Ceraul, Debtor, by and through her counsel, William Hronis, Esquire files this Answer to the Motion for Relief from the Automatic Stay of U.S. Bank Trust, N.A. as trustee of the Igloo Series III Trust (Docket Entry #50) as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Documentation speaks for itself.
- 4. Denied. Specific proof is demanded at the time of hearing. The Debtor's real property "204 South Main Street, Pen Argyl, PA 18072" is not located in Bucks County.
- 5. Document speaks for itself.
- 6. Denied. Specific proof is demanded at the time of hearing.
- 7. Denied. Specific proof is demanded at the time of hearing.
- 8. (a), (b), (c). Denied. Specific proof is demanded at the time of hearing.
- 9. Denied. Specific proof is demanded at the time of hearing.
- 10. Admitted.

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Madeline A. Ceraul, respectfully requests that this Court DENY the Motion for Relief from Automatic Stay under 11 U.S.C. §362 and Bankruptcy Procedure 4001; and to grant any other relief that this Court deems equitable and just.

Dated: February 4, 2019

/s/William Hronis, Esquire

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